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JUDGE WILLIAM M. NICKERSON

Donald J. Walsh

April 19, 2002

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The Honorable William Nickerson
United States District Court
for the District of Maryland
101 W. Lombard Street
Baltimore, MD 21201

Re: A Dias Ramos, et al v. Tennsmith, Inc.
Civil Action No. WMN 01-CV-2742

Dear Judge Nickerson:

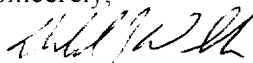
The parties have conducted written discovery and are in the process of supplementing their responses to each other. The parties have also identified the need for depositions of various witnesses. Due to the fact that the witnesses are found in Maryland, Tennessee, Virginia and Portugal, scheduling these depositions will take the parties beyond the discovery deadline previously set by the Court. The parties have discussed a schedule for completing discovery and are in agreement that, with the Court's permission, they would like to amend the Scheduling Order so that it reflects the following:

- Fact discovery is completed by June 28
- Supplementation of Discovery responses under FRCP 26 (e)(2) by May 31st
- Requests for Admissions served by July 3
- Plaintiff's expert disclosures are made by July 12
- Defendant's expert disclosures will be made by July 26
- All expert depositions will be completed by August 16
- A joint status letter will be submitted to the Court on September 3
- Deadline for filing pre-trial dispositive motions is September 16

The parties feel that they can work within this schedule to accomplish the discovery needs in this suit and request the Court's permission to amend the current Scheduling Order to reflect this agreement.


If you have any questions, feel free to contact either me or Mr. Jackson at anytime.

Sincerely,


Donald J. Walsh

cc: John Jackson, Esquire
John Murphy, Esquire

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" APPROVED " THIS 22nd DAY
OF April, 20 02

UNITED STATES DISTRICT JUDGE